

Message

From: Shine, Brenda [Shine.Brenda@epa.gov]
Sent: 3/11/2022 4:00:13 PM
To: Bouchard, Andrew [Bouchard.Andrew@epa.gov]; Lavoie, Tegan [lavoie.tegan@epa.gov]
Subject: FW: Chemical Sector Clean Air Act 114 ICR

I may just talk to her today, per this note

From: Maureen Harbourt <maureen.harbourt@keanmiller.com>
Sent: Friday, March 11, 2022 10:47 AM
To: Lassiter, Penny <Lassiter.Penny@epa.gov>
Cc: Shine, Brenda <Shine.Brenda@epa.gov>; Cozzie, David <Cozzie.David@epa.gov>
Subject: RE: Chemical Sector Clean Air Act 114 ICR

Thank you, I look forward to talking to Brenda.

Maureen Harbourt
Of Counsel
Kean Miller LLP
400 Convention Street, Suite 700
Post Office Box 3513 (70821-3513)
Baton Rouge, Louisiana 70802
225.382.3412 (direct)
225.937.5274 (mobile)
maureen.harbourt@keanmiller.com

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CONFIDENTIALITY

STATEMENT

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From: Lassiter, Penny <Lassiter.Penny@epa.gov>
Sent: Friday, March 11, 2022 9:03 AM
To: Maureen Harbourt <maureen.harbourt@keanmiller.com>
Cc: Shine, Brenda <Shine.Brenda@epa.gov>; Cozzie, David <Cozzie.David@epa.gov>
Subject: RE: Chemical Sector Clean Air Act 114 ICR

CAUTION: This email originated from outside of Kean Miller. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Maureen,

Thank you for your email below. Brenda will be reaching out to you regarding a time to discuss the CBI issues you raise below.

Penny Lassiter

Director,
Sector Policies and Programs Division
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code: E143-01
Research Triangle Park, NC 27711
(919) 541-5396
lassiter.penny@epa.gov

From: Maureen Harbourt <maureen.harbourt@keanmiller.com>

Sent: Thursday, March 10, 2022 12:33 PM

To: Lassiter, Penny <Lassiter.Penny@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>; Bouchard, Andrew <Bouchard.Andrew@epa.gov>

Cc: Linda Mirsky Brenneman (linda.brenneman@basf.com) <linda.brenneman@basf.com>; Moreno, Carlos <cmoreno3@dow.com>; 'bsago@eastman.com' <bsago@eastman.com>; Bob Stewart <bob.stewart@kellyhart.com>; Leonardo M Guglielmi <leo.guglielmi@us.indorama.net>; Kress, Heather (HN) <heather.kress@us.sasol.com>; Tokesha M. Collins-Wright (tokesha@lca.org) <tokesha@lca.org>; Gammage, Sam <gammage@texaschemistry.org>; Zenick, Elliott <Elliott_Zenick@americanchemistry.com>; Lauren Rucinski <Lauren.Rucinski@keanmiller.com>

Subject: Chemical Sector Clean Air Act 114 ICR

Dear Ms. Lassiter, Ms. Shine, and Mr. Bouchard:

Thank you again for the time that you took to speak with our group yesterday morning concerning the "Chemical Sector ICR" that EPA issued on January 18, 2022. During the call, among other things, we discussed the concerns of the group with the EPA instructions regarding Confidential Business Information that were contained in the information request. For your convenience, I am restating those instructions below:

Enclosure 1, Section 4.2, Instructions for Submitting your Survey Responses, Stack Test Results, Fugitive Sampling Location Plan, Fugitive Sampling Emissions Results, page 13 at footnote 1

¹ The EPA has identified only a few questions in Component I where a facility may choose to claim their response as CBI (refer to the instructions tab of Chemical Manufacturing Section 114 Component I Response_[Company]_[Facility].xlsx). In other words, EPA has determined that these few questions are the only questions that are part of this CAA Section 114 ICR where the facility can make a CBI claim. EPA has determined that facility responses to all other questions related to Component I and II of this CAA Section 114 ICR cannot be withheld from disclosure as confidential. Refer to Enclosures 3 and 5 for our rationale for this determination.

The Instructions Tab of Chemical Manufacturing Section 114 Component I Response_[Company]_[Facility].xlsx then stated:

CBI CLAIMS

The EPA has identified only a few questions in Component I where a facility may choose to claim their response as CBI. In other words, EPA has determined that these few questions are the only questions in Component I where the facility can make a CBI claim. These few questions are identified in the response template with green highlight and a footnote.

EPA has determined that facility responses to all other questions in the response template cannot be withheld from disclosure as confidential. Refer to Enclosures 3 and 5 for our rationale for this determination.

As indicated, only a handful of questions were highlighted in green in the survey, thus indicating that the responses to questions not highlighted in green are being treated by EPA as not susceptible of being claimed as CBI.

As discussed on the call, the recipients of the Chemical Sector ICR in our group are working diligently on responses to Component I of the ICR. The recipients in our group believe that a number of the requests *not* highlighted in green ask for information that clearly could be treated as CBI under the EPA rules in 40 C.F.R. Part 2, provided the responder submits the response and justification for CBI status in accordance with the provisions of Enclosure 5 of the ICR. We discussed some examples of such information on the call. The recipients in our group understand that “emissions data” as described in Enclosure 3 of the ICR cannot be held as confidential; but there are a number of “non-green” requests in the survey that call for providing data that is not emissions data.

If EPA is willing to revise its instructions for the Chemical Sector ICR through a letter or email in writing that would withdraw footnote 1 and the instruction for “CBI Claims” in the green box shown above, and instead provide its more standard CBI instruction used in other recent CAA 114 requests, then facilities would be able to submit such data to EPA in a more expeditious manner. The following is based on the standard instruction contained in recent CAA 114 requests:

*Under section 114(c) of the Act, 42 U.S.C. § 7414(c), and pursuant to regulations at 40 C.F.R. part 2, including 40 C.F.R. § 2.301, [company] may assert a confidential business information (CBI) claim covering part of all of the information submitted. Any claim for confidentiality must conform to the requirements of 40 C.F.R. § 2.203(b). **Note that emission data cannot be claimed as confidential under section 114(c).** 42 U.S.C. § 7414(c); see also 40 C.F.R. §2.301(a)(2)(e). Enclosures 3 and 5 contain information about and instructions for asserting a confidentiality claim and submitting information claimed as confidential. Any assertion of a CBI claim must be provided as part of the submission. If not CBI claim accompanies the information when it is received by EPA, then EPA may make the information available to the public without further notice.*

Please let us know as soon as possible if EPA is willing to make this revision to the instructions for the Chemical Section 114 ICR. Because the deadline under the ICR for Component 1 is only eleven (11) days away, this information is essential. If EPA is willing to make this revision, our group is certainly willing to inform the

Office of Information and Regulatory Affairs within OMB, where our petition for review under the Paperwork Reduction Act is pending, that this issue has been resolved.

This of course does not constitute any waiver of any of the recipient's rights with regard to objections to the deadlines or to individual issues with regard to the requests for information under the Chemical Sector 114 ICR; but such a change in the instructions certainly would resolve a significant issue.

Thank you in advance for your consideration of this request.

Sincerely,
Maureen N. Harbourt
Kean Miller LLP, on behalf of

American Chemistry Council, Louisiana Chemical Association, Texas Chemical Council
BASF Corporation; BASF TotalEnergies Petrochemicals, LLC; The Dow Chemical Company; Eastman Chemical Company; Eastman Chemical Texas City, Inc.;
Formosa Plastics Corporation, USA; Formosa Plastics Corporation, Louisiana; Formosa Plastics Corporation, Texas;
Indorama Ventures Oxides LLC; Indorama Ventures (Oxide & Glycols) LLC; Sasol Chemicals (USA) LLC; and
Union Carbide Corporation

Maureen Harbourt
Of Counsel
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STATEMENT

Message

From: Lassiter, Penny [Lassiter.Penny@epa.gov]
Sent: 3/10/2022 9:41:50 PM
To: Shine, Brenda [Shine.Brenda@epa.gov]
CC: Bouchard, Andrew [Bouchard.Andrew@epa.gov]; Cozzie, David [Cozzie.David@epa.gov]
Subject: FW: Chemical Sector Clean Air Act 114 ICR

Let me know when you want to talk about this.

Penny Lassiter

Director,
Sector Policies and Programs Division
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code: E143-01
Research Triangle Park, NC 27711
(919) 541-5396
lassiter.penny@epa.gov

From: Maureen Harbourt <maureen.harbourt@keanmiller.com>
Sent: Thursday, March 10, 2022 12:33 PM
To: Lassiter, Penny <Lassiter.Penny@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>; Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Cc: Linda Mirsky Brenneman (linda.brenneman@basf.com) <linda.brenneman@basf.com>; Moreno, Carlos <cmoreno3@dow.com>; 'bsago@eastman.com' <bsago@eastman.com>; Bob Stewart <bob.stewart@kellyhart.com>; Leonardo M Guglielmi <leo.guglielmi@us.indorama.net>; Kress, Heather (HN) <heather.kress@us.sasol.com>; Tokesha M. Collins-Wright (tokesha@lca.org) <tokesha@lca.org>; Gammage, Sam <gammage@texaschemistry.org>; Zenick, Elliott <Elliott_Zenick@americanchemistry.com>; Lauren Rucinski <Lauren.Rucinski@keanmiller.com>
Subject: Chemical Sector Clean Air Act 114 ICR

Dear Ms. Lassiter, Ms. Shine, and Mr. Bouchard:

Thank you again for the time that you took to speak with our group yesterday morning concerning the "Chemical Sector ICR" that EPA issued on January 18, 2022. During the call, among other things, we discussed the concerns of the group with the EPA instructions regarding Confidential Business Information that were contained in the information request. For your convenience, I am restating those instructions below:

Enclosure 1, Section 4.2, Instructions for Submitting your Survey Responses, Stack Test Results, Fugitive Sampling Location Plan, Fugitive Sampling Emissions Results, page 13 at footnote 1

¹ The EPA has identified only a few questions in Component I where a facility may choose to claim their response as CBI (refer to the instructions tab of Chemical Manufacturing Section 114 Component I Response_[Company]_[Facility].xlsx). In other words, EPA has determined that these few questions are the only questions that are part of this CAA Section 114 ICR where the facility can make a CBI claim. EPA has determined that facility responses to all other questions related to Component I and II of this CAA Section 114 ICR cannot be withheld from disclosure as confidential. Refer to Enclosures 3 and 5 for our rationale for this determination.

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Please let us know as soon as possible if EPA is willing to make this revision to the instructions for the Chemical Section 114 ICR. Because the deadline under the ICR for Component 1 is only eleven (11) days away, this information is essential. If EPA is willing to make this revision, our group is certainly willing to inform the

Office of Information and Regulatory Affairs within OMB, where our petition for review under the Paperwork Reduction Act is pending, that this issue has been resolved.

This of course does not constitute any waiver of any of the recipient's rights with regard to objections to the deadlines or to individual issues with regard to the requests for information under the Chemical Sector 114 ICR; but such a change in the instructions certainly would resolve a significant issue.

Thank you in advance for your consideration of this request.

Sincerely,
Maureen N. Harbourt
Kean Miller LLP, on behalf of

American Chemistry Council, Louisiana Chemical Association, Texas Chemical Council
BASF Corporation; BASF TotalEnergies Petrochemicals, LLC; The Dow Chemical Company; Eastman Chemical Company; Eastman Chemical Texas City, Inc.;
Formosa Plastics Corporation, USA; Formosa Plastics Corporation, Louisiana; Formosa Plastics Corporation, Texas;
Indorama Ventures Oxides LLC; Indorama Ventures (Oxide & Glycols) LLC; Sasol Chemicals (USA) LLC; and
Union Carbide Corporation

Maureen Harbourt
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STATEMENT

Message

From: Chow, Alice [chow.alice@epa.gov]
Sent: 1/19/2022 5:23:48 PM
To: Bouchard, Andrew [Bouchard.Andrew@epa.gov]
Subject: FW: Chemical Sector CAA Section 114 Request
Attachments: UCC Chem Sector 114 Letter.pdf; Chemical Manufacturing Section 114 Component I Response_[Company]_[Facility].xlsx; Chemical Manufacturing Section 114_Enclosure 1-6.pdf; Chemical Manufacturing Section 114_Fugitive Emission Test Results_[Company]_[Facility].xlsx; Chemical Manufacturing Section 114_nonERT Stack Test Results_[Company]_[Facility].xlsx; Chemical Manufacturing Section 114 Component I Questions.docx; UCC NEI Files.zip

Hi, Andrew: I seemed to recall when we all last spoke that there were only 2 facilities in R3 for the chemical manufacturing sector, am I correct?

Alice W. Chow
Br
Ai
U:
P:
Email: chow.alice@epa.gov



Division
c Region 3
44

[f](#) [t](#)

From: Fernandez, Cristina <Fernandez.Cristina@epa.gov>
Sent: Wednesday, January 19, 2022 12:15 PM
To: Chow, Alice <chow.alice@epa.gov>
Subject: FW: Chemical Sector CAA Section 114 Request

FYI


Cristina Fernández
Division Director
Air & Radiation Division
US EPA Mid-Atlantic Region
Phone 215-814-2178
Email fernandez.cristina@epa.gov

[f](#) [t](#)

From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Sent: Wednesday, January 19, 2022 12:12 PM
To: Wozniak, Russell <wozniara@dow.com>
Cc: Ortiz, Adam <Ortiz.Adam@epa.gov>; Fernandez, Cristina <Fernandez.Cristina@epa.gov>; Opila, MaryCate <Opila.MaryCate@epa.gov>; Hall, Kristen <hall.kristen@epa.gov>; Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>;

Tonya.Baer@tceq.texas.gov; Celena Cage <celena.cage@la.gov>; Crowder, Laura M <laura.m.crowder@wv.gov>;
renu.m.chakrabarty@wv.gov; Adkins, Jesse D <jesse.d.adkins@wv.gov>

Subject: Chemical Sector CAA Section 114 Request

Mr. Wozniak,

Your company, Union Carbide Corporation, pursuant to section 114 of the Clean Air Act, is receiving an information collection request that covers emissions from sources within the chemical manufacturing industry. A signed copy of this request is attached to this email, along with several enclosures, response templates, and an emission inventory for each facility subject to this request for your review. Your responses to this request are due back to the EPA according to the various dates specified in Table 4 of Enclosure 1, along with the signed certification statement provided in Enclosure 6 of this request.

Please let me know if you have any questions or if you have issues opening any of the attachments. Thank you.

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

Message

From: Bouchard, Andrew [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2039DC5C124E46F28DCE757FDD8A1C2D-BOUCHARD, ANDREW]
Sent: 1/13/2022 7:34:15 PM
To: Lassiter, Penny [Lassiter.Penny@epa.gov]
CC: Shine, Brenda [Shine.Brenda@epa.gov]; Cozzie, David [Cozzie.David@epa.gov]
Subject: RE: Draft CAA Section 114 ICR For Chem Sector
Attachments: Chemical Manufacturing Section 114 Component I Questions_v2.docx

Hi Penny,

See responses in red below. If you're okay with everything, it'd be great to try and get the revised letters I sent this morning signed so we can get the request out the door. Let me know if you need more specifics or follow-up on any of these.

Ex. 5 DPP/ACP

Ex. 5 Deliberative Process (DP)

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Lassiter, Penny <Lassiter.Penny@epa.gov>
Sent: Thursday, January 13, 2022 11:39 AM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Cc: Shine, Brenda <Shine.Brenda@epa.gov>; Cozzie, David <Cozzie.David@epa.gov>
Subject: RE: Draft CAA Section 114 ICR For Chem Sector

Andrew – A few comments/questions:

Ex. 5 Deliberative Process (DP)

Penny Lassiter

Director,
Sector Policies and Programs Division
Office of Air Quality Planning and Standards

U.S. Environmental Protection Agency
Mail Code: E143-01
Research Triangle Park, NC 27711
(919) 541-5396
lassiter.penny@epa.gov

From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Sent: Thursday, January 13, 2022 10:24 AM
To: Lassiter, Penny <Lassiter.Penny@epa.gov>
Cc: Shine, Brenda <Shine.Brenda@epa.gov>; Cozzie, David <Cozzie.David@epa.gov>
Subject: RE: Draft CAA Section 114 ICR For Chem Sector

Re-sending with revised letters that include formal job titles and physical addresses for each recipient.

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Bouchard, Andrew
Sent: Tuesday, January 11, 2022 12:22 PM
To: Penny Lassiter <Lassiter.Penny@epa.gov>
Cc: Brenda Shine <Shine.Brenda@epa.gov>; David Cozzie <Cozzie.David@epa.gov>
Subject: Draft CAA Section 114 ICR For Chem Sector

Hi Penny,

Here's a draft of the CAA section 114 ICR we are planning to send out for the chem sector. Here's a breakdown of what's included for your review:

- A draft of 8 letters for your signature, one for each of the entities we plan to send the request to. In all, we anticipate 21 facilities responding the request. Note that we are still awaiting to hear from ACC on folks' formal job titles and physical mailing addresses as noted in a comment bubble in the letters.
- 1 PDF that contains enclosures for our request. The bulk of the request information can be found in Enclosure 1 as the other enclosures are the more standard we send with all our requests. As you'll see, there are two components in Enclosure 1, a questionnaire (Component 1) and a stack testing/sampling and fenceline monitoring request (Component 2).
- 1 Word document containing our Component 1 questionnaire

Items not included, but can pass along for your review if needed:

- Component 1 questionnaire response template in Excel (I attached a Word version of the Component 1 questions, but can pass along the Excel response template if needed. The Word version is a bit easier to review).
- Non-ERT Stack Test Excel reporting template
- Fenceline Monitoring Excel reporting template
- Facility specific 2017 NEI files in Excel for the entities to review

Let me know if you have any issues, comments, etc. Thanks!

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

Message

From: Thrift, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0176CFAA431F411BAB9801A035378C2B-MTHRIFT]
Sent: 10/25/2021 6:37:59 PM
To: Garretson, Eleanor [Garretson.Eleanor@epa.gov]
Subject: RE: New PRA question regarding SOCMI/HON ICR under the CAA

Thanks, Eleanor, I'll schedule something on Outlook.

From: Garretson, Eleanor <Garretson.Eleanor@epa.gov>
Sent: Monday, October 25, 2021 7:01 AM
To: Thrift, Mike <thrift.mike@epa.gov>
Subject: RE: New PRA question regarding SOCMI/HON ICR under the CAA

Hi Mike,

It'd be great if we could set up some time to walk through this a bit more. I'm caught up in some work today but could meet tomorrow or Wednesday if that would work for you.

Thanks!

Eleanor

Eleanor Garretson
Attorney-Advisor
U.S. Environmental Protection Agency
Office of General Counsel, WLO/CCILO
Cell: (202) 495-8997
Office: (202) 564-9636

From: Thrift, Mike <thrift.mike@epa.gov>
Sent: Friday, October 22, 2021 5:29 PM
To: Garretson, Eleanor <Garretson.Eleanor@epa.gov>
Subject: New PRA question regarding SOCMI/HON ICR under the CAA

Hi Eleanor—

About a month ago, OAQPS staff convened a call regarding the 9-or-fewer-entities ICR they are developing to support upcoming action to review risks from hazardous air pollutant (HAP) emissions from sources in the synthetic organic chemical manufacturing industry (SOCMI) and revise standards as necessary to protect public health.

Ex. 5 Attorney Work Product (AWP)

Ex. 5 Attorney Work Product (AWP)

Ex. 5 Attorney Work Product (AWP)

Ex. 5 Attorney Work Product (AWP)

Ex. 5 Attorney Work Product (AWP)

Would be happy to discuss next week, if that could make things clearer.

--Mike

Mike Thrift
USEPA OGC
202-564-8852
Thrift.mike@epa.gov